# UNITED STATES DISTRICT COURT DISTRICT COURT OF NEW HAMPSHIRE

CASE NO.	, pres
	<b>2016</b> 01:S.
LISA A. KENNEY, PRO SE	STRICT FILE
Plaintiff,	7 29
<b>V</b> .	<b></b>

MASSACHUSETTS STATE POLICE; COL. RICHARD MCKEON, In his official capacity as Superintendent for the Massachusetts State Police, TROOPER DAVID MANNING, in his official capacity as trooper for the Massachusetts State Police, TROOPER CHARLES F. KANE, in his official capacity as Sergeant for the Massachusetts State Police, TROOPER WILLIAM P. KENNEY JR. in his official capacity as trooper for the Massachusetts State Police.
PRIVATE INVESTIGATOR ROBERT LONG, in his official capacity

for the Massachusetts State Police,
PRIVATE INVESTIGATOR ROBERT CERULLO, in his official capacity as
President of 20-20 Investigations and agent or employer
for the Massachusetts State Police
KATHLEEN M. MORRISSEY, in her official capacity as President of

as President for Robert Long Investigations, LLC and agent or employer of

KATHLEEN M. MORRISSEY, in her official capacity as President of Law Offices of Kathleen Morrissey.

Defendants		

**COMPLAINT FOR PRELIMINARY INJUNCTION** 

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# 28 U.S. C. 1331. Federal Question

The district courts shall have the original jurisdiction of all civil actions arising under The U. S. Constitution and the laws treaties of the United States.

## **COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

#### Nature of action.

- 1. Our Nation is built on a foundation of free speech, dissent, and protest; since our very founding, the Plaintiff has been aggressively pursued and harassed by some members of the Massachusetts State Police and it's agents for peacefully exercising her rights to petition the government and seek redress for governmental wrongs which is protected under the First Amendment.
- 2. Further, the right to be free from unreasonable searches and seizure by the Government is fundamental to the proper functioning of our criminal justice system, and reflects the Plaintiffs deep concern for personal security and their recognition of the potential excesses.
- 3. Massachusetts, by way of it's Officers, and agents acting as officers, violated Due Process' and, conspired to deprive the rights of the petitioner; and did neglect to prevent deprivation of rights under Title 18, U.S.C. 241 and Title 18, U.S.C 242.
- 4. Defendants have responded to the Plaintiff asserting her inalienable rights with unlawful restrictive actions, excessive force, and disproportionate policing tactics officer have obstructed and impeded justice, threatened physical and sexual assault, engaged in verbal abuse, physical abuse, and created an imminent risk of physical and constitutional harm.

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- 5. Specifically, these Massachusetts law enforcement officers, private investigators, and the paid criminal agents recruited by Trooper David Manning have engaged in and ratified policies, practices, legal restrictions, and conduct that violates Plaintiff's clearly established constitutional rights by, among other actions:
  - **a.** Engaging in widespread unreasonable searches and seizures of individuals residences and vehicles within Massachusetts and New Hampshire.
  - **b.** Excessive force
  - **c.** Failure to follow due process.
  - **d**. Responding to nonviolent activity with unconstitutional levels of force and threat
  - e. Entering Plaintiffs residence and instructing their criminal informants to enter her properties unlawfully and without probable cause. Illegal search and seizures by the paid civilian and criminal agents working for them.
  - **f.** Unlawfully entering the plaintiffs properties and causing destruction to her properties along with theft consisting of evidence she holds on Defendants.
  - g. Illegal surveillance and tracking placed in and on Plaintiffs property for years on end without probable cause and without warrants. Allowing civilians and police assist who have vandalized, stolen, and destroyed property inside Plaintiffs home and vehicles on the instructions of Defendants.
  - h. Issuance of threats, intimidations, false arrests, false restraining orders, threats of physical harm in a bid to deter Plaintiff from reporting this.

- Threats to cancel her Social Security Disability Benefits following her initial
   2010 complaint to the Massachusetts Attorney General Martha Coakley.
- j. Endless and needlessly restrictive actions and abusive police powers which include prohibiting the Plaintiff from enjoying her rights to freedom of movement, freedom of self determination, and her freedom to life and personal liberties. The daily and yearly continued abuses at the hands of Massachusetts Police Officers are creating an intolerable way of life. She's harassed on a daily basis regardless of what she does throughout the day due to her disability. If Plaintiff cooks a meal, goes to the market walks to get exercise, the officers get messages to her in order to let her know she is being watched. They send daily comments such as she's "well enough to go to work"
- **k.** Gross and unreasonable invasion of privacy and governmental intrusions include sexual exploitation of the Plaintiff on numerous occasions, placing her footage on live feeds, online, and distributing the footage. Also, threats of future distribution of videos. Accessing all of her personal credit accounts, emails, and bank accounts.
- 1. Obstruction of justice. Abuses of court proceedings in an attempt to assist Defendant win his child support cessation case. Encouraging other officers to write or refuse to write police reports when Plaintiff reported these crimes and abuses of police power. Accessing Plaintiffs personal email accounts to delete evidence she retains on them.
- **m.** Illegal detention and deprival of Due Process'. Police stings set up by these officers and their agents, including investigators and civilians who appear to be working 'as police officers' alongside troopers and take place in private and unoccupied homes, some of which are on the market and for sale. Subjects are released and not charged

with Trooper Manning illegally filming it to distribute to the public with claims the Plaintiff committed a crime.

- **n.** Abuse of process.
- 7. In doing so, Defendants have deprived Plaintiffs of rights secured under the First (freedom of speech), Fourth (illegal search and seizures), and Fourteenth (rights of due process and equal protection) Amendments to the Constitution.
- 8. These officers and agents are ignoring their own legal restrictions to go outside their jurisdiction under a guise of an active police investigation to continue to deprive Plaintiff of her rights while using brutally oppressive police tactics to do so with hopes of silencing her.

#### FACTUAL BACKGROUND GOVERNMENTAL INTRUSIONS

# <u>Plaintiffs incorporate by reference the factual allegations contained in the Verified Complaint.</u>

- 9. This civil-rights lawsuit against the Massachusetts State Police and several individually named troopers arises from the defendant's systematic attempts to conduct unlawful searches and seizures of plaintiffs' property in order to harass, intimidate, and discourage lawful First Amendment activities and did deprive plaintiff of her Fourth and Fourteenth Amendment rights which have continued unabated for years.
- 10. Plaintiff Lisa A. Kenney is entitled to a preliminary injunction to prevent Defendant Trooper David M. Manning, a Massachusetts State Trooper, his agents and criminal informants, who

have a penchant for abusing their police powers and surveillance equipment to invade the privacy of private citizens, from continuing to harm her through improper use and exploitation of her name, private information, her person, illegal surveillance violations of her constitutional rights, and intrusions into her private life, with retaliations against her due to reporting these misconducts and deprivations.

- 11. In an age where police technological advancement has resulted in the increased ability for law enforcement to encroach into the most private spheres of an individual's life with ease, Trooper David Manning epitomizes such invasion. Manning and his agents have singled out the Plaintiff for harassment, exploitation, intimidation, and embarrassment by revealing details regarding her private home life and boasting about the live feeds and footage he's obtained using police surveillance tactics and devices.
- 12. Manning also uses equipment obtained with the assistance of the private investigators he works with, some are former Massachusetts State Troopers such as Defendants Long and Cerullo. This footage of the plaintiff has has been both distributed and published online. The Plaintiff has also been threatened with future distribution of the illegal footage of the videos if she continues reporting their unconstitutional misconduct. She's also received a message from Manning referring to this situation as a "game" along with more threats of physical violence or sexual harm toward her.
- 13. Trooper Manning has made it publicly known he holds this footage and has also made comments alluding to recorded bathroom footage and her unpaid "Sag wages and hollywood movies" he's shot of her, and "she doesn't know how popular she is". The Plaintiff became aware due to friends and officers commenting to her, messages they've sent to her, as well as daily

public postings consisting of graphic and accurate descriptions of her along with daughter while in the bathroom.

14. Manning has also filmed and distributed two or more sexual incidents of the Plaintiff which he and his private investigator agents set up with malicious intent. Manning boasting about owning these videos and also placed still photos of one incident on a public forum which Plaintiff viewed.

15. The Plaintiff had no knowledge of this and did not consent but he took it upon himself to film, record, and publicized them. Footage was distributed online, via cell phone, and to numerous people including police officers, civilians, and former co-workers of the Plaintiff. Plaintiff has uncovered several pages which consists of numerous people discussing the video, laughing at the Plaintiff, and writing about how this should be hidden from the State Police.

16. This was an illegal procedure with both civilians and private investigators running operations as police officers they had no business running. This incident was held at a location on private property which was for sale not state police jurisdiction. Manning set-up the event and the others involved are also tied to 'Kenney' who is Plaintiff's ex-husband. The civilian man who has sex with the women while acting as an officer is also friends with 'Kane'. He was also found parked in Defendant Cerullos parking lot.

17. Plaintiff believes they've edited the video in an attempt to hide the truth about what happened and does not believe there was any investigation into these practices or her complaints. The troopers sent the same civilian man to stalk and follow Plaintiff during 2010. This incident was held by the Defendants who are friends and co-workers of Defendant 'Kenney' and took place two months after Plaintiff filed for the child support increase. Defendants claim

what took place was an "accident" yet they had immediately sent Plaintiff harassing emails laughing about the incident and sent the same man to stalk her 2 years later.

18. As soon as Plaintiff found the car the man was driving, the police altered the vehicle to change the license plate, add stickers to the rear window, and they changed the tail lights in order to protect him. This was set up for vengeance and what transpired was planned and filmed. The man was hidden and protected from the video but Trooper Manning ensured the video went viral to expose the Plaintiff. Plaintiff continued to try and report this with Manning sending her a message telling her to "hurry up" as the 'Statute of Limitations' on this was due to run in two weeks. It's highly likely he blocked all of Plaintiffs complaints from getting through during this time.

19. Approximately one year prior Plaintiff dated Manning a short time during 2007 and ended the 'relationship' due to his angry and odd character. He then sent her an email to accuse her of "Sticking it to him for no reason" after he "Opened up his entire world to her", he's sent emails admitting to hacking her bank account, emails, and holding copies of the keys to her home and truck.

20. She has Manning's public writings he publicly posted about Plaintiff and how he was "dumped" by her referring to her as a "fat slob", as well as his claims that "First Amendment rights do not apply to her", or as he called her, an "Asshole". His reaction to the complaints for help were that "she needs to be restrained from writing inflammatory remarks". This clearly shows he knows what Constitutional rights are but he believes it's up to him to decide whether a citizen is entitled to them or not. He stated this just after the Plaintiff began reporting their human rights abuses and crimes they were committing against her.

He still threatens Plaintiff online with the distribution of the videos today. Manning has also recruited a drug dealer in Plaintiff's building to threaten and harass her again who frequently stands outside her apartment door to yell his threats of physical harm and to say "I've seen the videos of her". Plaintiff frequently avoids going home and has not been able to go home now for over three weeks. She fears what will happen to her if this group is not allowed to continue.

21. Plaintiff also holds several conversations of these police officers who were online discussing their need and want to view videos of women on the toilet. She's aware these officers not only do it for vengeance, but feel they have the right to view unsuspecting attractive women if they want to see them undressed. They do this using their police surveillance technology and their agents, or private investigators. They are still engaging in this activity at Plaintiff's new residence in N.H.

22. During Plaintiff and Manning's friendship he once told her he has the ability "to see any hot woman naked he wants" and now she knows why. These are shocking and disgusting abuses of police powers by way of advanced police technology and surveillance techniques to exploit women in the privacy of their homes, bathroom and shower. These officers, including Manning are now in the process of changing the names on accounts which tie them to these activities and videos. They are aware Plaintiff holds this evidence because she's reported it for the last six years. Plaintiff asserts this is done to many unsuspecting women and has viewed the officers many public posts online showing women undressed in their bathrooms which these officers titled 'Peeping Tom'. She's also obtained their personal 'Ebay' accounts which are named 'Peeping Tom', 'Breastfeeds', along with many other accounts which hold derogatory names toward women.

23. This group holds bogus police stings using their civilian agents and friends which are filmed in private and unoccupied homes. These civilians and police engage in sexual activities with the

women which are secretly filmed and distributed by Trooper Manning and his 'agents'. The Plaintiff committed no crimes during this incident but those running the illegal operation had the civilian they refer to as 'Mathias' throw money at her before she was released and said (paraphrasing) "You weren't expecting this were you?". The women were released and the videos distributed while protecting the men involved. This was followed by labeling the women prostitutes without following Due Process and violating her rights to equal protection under the law which is protected by the Fourteenth Amendment.

24. The officers then sent the same man to stalk and follow Plaintiff two years after the incident. This event was planned well in advance with no one being charged, the several police officers who were surrounding the home failed to protect the women from harm with standard police procedures not being followed. Plaintiff had observed 'Mathias' adjusting the wire under his shirt prior to the incident taking place.

25. This was an unconstitutional sting which ended with Manning and his 'agent's filming the incident, emailing Plaintiff afterward to laugh about it, and celebrating the incident by way of ensuring the video went viral. This is not standard or acceptable police procedure but was done out of vengeance. Afterward Plaintiff advised those involved that she will find out who they were and she will report the incident. They did all they could to protect 'Mathias' and they're still trying to shield him today. During 2007, Defendant Kane had been trying to lure the Plaintiff to another location where these officers and 'agents' engage in these same activities. Plaintiff declined Kane's offer to meet him there.

26. Massachusetts, by way of it's Officers and agents, violated 'Due Process' and, conspired to deprive rights of the petitioner; and did neglect to prevent deprivation of rights at <u>Title 18, U.S.</u>

C. 241 and Title 18, U.S.C. 242. They are currently going outside their jurisdiction to continue

27. Massachusetts Law Enforcement appears to be looking the other way as Trooper Manning continues his abuses. Plaintiff asserts Trooper Manning, along with Troopers Charles Kane, William Kenney, Jr., Investigators Robert Long and Robert Cerullo, Kathleen Morrissey conspired amongst each other to injure, oppress, threaten, and intimidate her in order to deny the free exercise and enjoyment of the rights and privileges secured to her by the Constitution and laws of the United States.

Since 2010, Plaintiff had sent the State Police, Colonel McKeon and his Internal Affairs Department numerous emails and complaints on these continued violations and abuses at her residences but they have failed to prevent, intervene, or ensure his police force abides by their constitutional duties.

#### **CAUSES OF ACTION**

# Freedom of Speech and Assembly

Violation of First and Fourteenth Amendments to the U.S. Constitution and the Due Process Clause of the Fourteenth Amendment.

The First Amendment to the U.S. Constitution prohibits abridgement of freedom of speech and assembly; with the right to petition the government for redress. Plaintiff has always been peaceful throughout her quest to receive justice for the injustices committed.

- 1. Under 42 U.S.C. § 1983, every person acting under color of state law who deprives another person of his or her constitutional rights is liable at law and in equity.
- 2. Additionally, under 42 U.S.C. § 1983, municipal defendants are "persons" liable for unconstitutional customs, practices, policies, and failure to train their law enforcement Officers.
- 3. Defendants have deprived, and continue to deprive, Plaintiff of her rights under the First Amendment, Fourth Amendment, and Fourteenth Amendment of the U.S.
  Constitution. The right to free speech, the right to be free from illegal search and seizures, and she was deprived of equal protection of the law. Defendant Manning has publicly stated the First Amendment right doesn't apply to Plaintiff.
- 4. Upon information or belief, the Defendants and their high-ranking policy making officials have intentionally developed and implemented customs, practices, as well as policies according to their own opinions, preferences, and methods of justice to which citizens are being harassed, threatened, oppressed, and illegally detained. These unlawful customs, practices,

and/or policies caused the violations of the Plaintiffs constitutional rights as their high ranking superiors looked the other way.

- 5. The Defendants and their high-ranking policymaking officials were well aware the serious risk that these customs, practices, and officers preferred method of taking matters into their own hands would result in unconstitutional violations and conduct. The superiors of these officers had been notified over 100 times during the last six years yet still failed to train or prevent these troopers from violating these rights, despite actual or Constructive knowledge of ongoing and repeated violations.
- 6. The First Amendment to the U.S. Constitution is applied to the states through the Fourteenth Amendment. The Fourteenth Amendment to the U.S. Constitution and Article I, Sections Two, Thirteen, and Sixteen prohibit the criminalization of speech without due process. Statutes that vest unbridled discretion in state officials to regulate speech violate the free speech and Due Process protections of the U.S. and New Hampshire Constitutions.
- 7. Upon information or belief, unless restrained by this Court, Defendants will continue their practice of disregard for the law, lawless behavior, and continue to violate the plaintiffs rights. In fact, she is certain it will escalate as it has over the years.

Plaintiff repeats, re-alleges, and incorporate by reference the allegations in the Foregoing paragraphs of this Complaint as if set forth here verbatim.

8. The Plaintiff has exhausted all efforts within Massachusetts, as well as within the Massachusetts State Police and their Internal Affairs Department who appear to condone the unlawful activities. There is no justifiable reason for the state to treat such equally situated

citizens in such a cruelly disparate manner by depriving deprived the plaintiff of her her right to equal protection under the law which is guaranteed to all persons by Part One, Articles 1, 2, 4, and 12 of the New Hampshire Constitution.

- 9. Upon information or belief, unless restrained by this Court, Defendants will continue their practice of disregard for the law, aggressive behavior, and continue to violate as well as other women's rights. This group is known for their exploitations of women and they're known to initiate false charges in hopes the citizens will succumb to the sick unexplainable disproportionate aggressions towards women. This is not an issue of training, these Defendants know the U.S. Constitution but they choose not to follow it.
- 10. While the Plaintiff is committing no crimes, these troopers, investigators, and their agents work in New Hampshire in order to continue their campaign of harassment and retaliatory tactics using criminals who live in or near Plaintiff's residence to violate, stalk, exploit, threaten her, intimidate her, and deprive her of her person liberties and self determination.
- 11. There is a clear pattern of these government intrusions and illegal surveillance which dates back years by a disproportionate amount of officers and investigators who are friends and co-workers of her ex-husband. They hold ten years of surveillance on Plaintiff yet claim to need more. This either shows incompetence or it shows they're doing it for their own agendas.
- 12. Their retaliatory tactics started as soon as Plaintiff began reporting them during 2010, all in an attempt to keep her quiet. The threats then turned to false charges to intimidate Plaintiff, cost her money, and wear her down and into submission. They had the five digit door access

code to her two Ford vehicles which gave them access inside her vehicles. Plaintiff has obtained a few pages of these access code the officers publicly posting online in order to allow the criminals they recruit to enter her car at will to vandalize, steal, and plant drugs in it.

- 1. Several death and rape threats to Plaintiff
- 2. Threats to expose more videos of Plaintiff
- 3. Rape threats toward her child and threats to take child away
- 4. Threats to cancel Plaintiffs SS Disability Benefits
- 5. Threats to set her up with drugs or a handgun
- 6. Threats to pay others to come forward and lie for them.
- 7. Threats to incarcerate her
- 8. Threats to her family
- 9. False restraining order by the criminal they sent into her home daily
- 10. Second false restraining order.
- 11. False assault case and arrest
- 12. Daily property destruction inside her home and auto.
- 13. Drugs placed under her passenger seat found by Plaintiff and family.

#### **BACKGROUND HISTORY**

28. The Plaintiff currently resides in an apartment complex located at 48 Henriette St on the Goffstown-Manchester line in the Southern part of New Hampshire. She has lived there since October of 2015. During 2013, Plaintiff made the decision to go to Massachusetts and move to New Hampshire with hopes to be free to enjoy her life with hopes of being safe, enjoying her privacy, and to be free of the endless intrusions which have plagued her for so many years.

29. Plaintiff yearned to be finally free from the physical and visual intrusions into her private life by members of the Massachusetts State Police, her ex-husband, criminal informants, and Massachusetts licensed private investigators. The Plaintiff had been married to a Massachusetts

State Trooper and separated during 1998 with reasons for the separation being endless abuses of police powers which entailed continuous stalking of her, invasion of her privacies, and the recruiting his police friends to monitor her in an effort to control her. While married, 'Kenney' allowed her 50 dollars out of her paycheck to spend per week out of her weekly pay, she wasn't allowed to exercise or join a gym, she wasn't allowed to dress as she chose, and she would be allowed to socialize one night per year. He used to track her vehicle and gave her a pager during their dating years so he could check up on her hourly to ask if men were talking to her.

30. The five years following their separation consisted of 'Kenney' telling everyone he and Plaintiff were still married even after their divorce was finalized. By doing so it prevented other men from approaching her. Plaintiff saved a recording of 'Kenney' advising her he will shoot her, he would claim "job stress", and check himself into The "Bournewood Hospital" to get away with it if she ever cheated on him or left him. After ten years Plaintiff accept this stalking treatment wouldn't change and they remained on cordial terms until mid- 2008 when she filed for a child support increase in Probate Court.

31. 'Kenney' was never violent with Plaintiff and after the divorce she allowed him to stay at her home which he did most of the time. She allowed this because she feels he drinks too much and she did not want a drunk person caring for their child. Plaintiff feels after she filed for child support increase is when several of the Defendants came after her using many set up and entrapment tactics to assist him in Probate Court. Kenneys stalking was always present and consisted of his making it known he knew where she had been and who she had been in contact with.

32. 'Kenney' had always recruited his friends to 'watch' her, and he's always invaded her privacy, he's told her numerous times his police friends watch her and report back to him, and during 2009 he sent her a text message which read "My P.I. did a great job on you". This message was a

reference to his friend; Defendant Private Investigator Robert Long. Long was also a part of the false assault which they paid a woman two thousand dollars to implement.

33. Had Plaintiff been convicted of this assault it would have helped in 'Kenneys' child support cessation case but Plaintiff was found not guilty. Plaintiff also believes it was one of the two Defendants 'Long and Cerullo' along with 'Manning' who orchestrated the unconstitutional 'police sting' to which she was a victim. 'Manning', Long, and 'Kane' have their own underlying motivational factors which explains their willingness to conspire against Plaintiff with her exhusband to assist him with his custody battles. Once their plan was unraveled by Plaintiff, and the of reporting this is when the police brutalities and human rights abuses increased.

34. The two thousand dollar false arrest would be the third false charge the officers coached others to file on Plaintiff. They devised a strategy to implement a harassing, threatening, and intimidation campaign with hopes of silencing her. When their threats failed to yield the desired results, they escalated their strategy and resorted to using harsher methods with hopes she'd comply. Plaintiff has also uncovered all of the Defendant's' ties and communications with 'Kenney's Probate Attorney Kathleen Morrissey.

35. With regard to the illegal surveillance, the Plaintiff has been stalked and staked out for years by a couple of seemingly obsessed state troopers and private investigators who are fixated on her due to personal vendettas arising from events which took place years ago. During 2007, after Plaintiff fought with Manning he sent her an email admitting to hacking her bank and email accounts and having access into her homes and vehicle. All of her personal accounts have been accessed remotely, her homes and vehicles have been entered illegally and vandalized, with many thefts occurring during these break ins. Plaintiff has also obtained a computer forensics report stating thirty three separate IP addresses have remote administrative rights to her

personal computer. The contents to her emails were posted publicly online as were her email passwords and secret answers which protect your account to secure your privacy and protection.

36. Moreover, she has also been the recipient of threats to her safety and has had to deal with this on an ongoing basis by criminal informants, or 'rats', who work with and for Trooper Manning and who have intent to inflict personal injury on her. Plaintiff does hold the shocking instructions Manning issued inciting one of his criminal informants to get a false restraining order on Plaintiff, break into her home daily, commit human rights abuses against her and her child, and to assist him with the illegal surveillance which was installed in the Plaintiffs bathroom and shower. This was done solely with intents to degrade, humiliate, and sexually exploit them.

37. On these instructions Manning instructed him to steal the lease from the Plaintiff home which the criminal did shortly after he was told. The homeowner at the time was friends with the Defendants who afterward claimed 'There was no lease'. The plan was to evict Plaintiff and that's why the criminal was instructed to remove it. Defendants would later do this again.

38. Both Plaintiff and her minor child witnessed Manning's criminal informant attempting to enter her home until Plaintiff stopped him told him to "get out". What began online as cyber stalking with Manning and his agents posting her name, addresses, and personal information, turned daily messages from their group to "take out the trash" and "do the dishes" when these chores backed up. They were letting it be known they had surveillance in her home by repeating the conversations she was having and telling her to "pick up" an object the had dropped.

39. Plaintiff holds Manning's public instructions he sent this criminal instructing him to "poison, weaken, and sicken the public". Criminal was also told to file a civil restraining order on her which he did, he was told to stalk the child, and to assist with the bathroom cameras. These

degrading and inciting posts referred to her as a whore, fat pig, slut, lesbian, dyke, old, as well as Defendant plotting harm to her with plans to teach her a lesson. Manning also wrote "her punishment will be served by her allies". When Plaintiff got out of bed in the morning messages would be sent which read "I love watching you sleep" and would continue throughout the day and evening making comments about what she was doing at home. They told her they will ensure no one will help her and Plaintiff was turned down by twenty attorneys who upon hearing her name or her ex-husband's name immediately declined. The Plaintiff only just learnt she is able to file against them after all these years thus the reason this is quite lengthy.

40. Many times short messages including insults, body comments, and obscenities would be sent to her computer and they would call her landline daily to harass her. During 2011 Plaintiff has uncovered instructions from Manning to this criminal to return an item he stole from Plaintiff as the criminal had left footprints in the snow while they were away for a week. The item stolen from her home was a camcorder which was later returned to the glove box of her vehicle. He entered her vehicle using the five digit door access code Manning and his group publicly posted online. Criminal never returned anything else he stole which includes electronics owned by the child. Private property and a brand new bedroom set the Plaintiff just bought was gouged and damaged with a sharp object creating a five foot gash alongside of the bed. This is also the time Manning publicly posted accurate and graphic descriptions of Plaintiff and her child actions while they were using their bathroom.

These descriptions include when they had their menstrual periods, used the toilet, his suggesting when they needed to shave their private areas, and daily degrading body comments some of which Plaintiff has printed and retained. Since he was remotely tied to her pc he could see where she was online and the comments would be sent to where Plaintiff would view it. After moving, yet knowing this would continue as they'd threatened, Plaintiff covered her toilet

area with a blanket for privacy. When she went online one of them sent a message which read "We can place it inside your toilet too", with a reference to 'all weather devices' the police have access to.

41. The fun these officers had while stalking and exploiting Plaintiff for their own voyeuristic pleasures was combined with daily stalking of Plaintiff in person and online for her ex-husband for over ten years. Their campaign of hatred, stalking, and exploitation then turned to the many shocking brutalities, unconstitutional actions, deprivations, and abuses of police powers upon her uncovering these actions, those involved, and her immediately reporting it.

42. Plaintiff became aware due to comments being made to her as well as her private information and photos being disseminated on the internet via public chat forums. During 2010, the Defendants were posting the description of her residence along with specific items she owned and where they were located inside her home. During this time, and at the suggestion of the Probate Court, the plaintiffs new residential address was impounded from the court records in an attempt to prevent her ex-husband from finding her location.

43. A few weeks later she was being stalked online by his co-workers who had full knowledge of her residence. Since they were remotely tied to Plaintiff's computer they were aware as soon as she went online and where she was searching online. The Defendants would then follow her to the same site she was on to leave their comments. Trooper Manning sent her daily messages to laugh about her on the toilet, in the shower, and her physical appearance including her undressed and her hair. This group has created registered Ebay account names which are under the place Plaintiff's name as well as the salon she had her hair done. Plaintiff holds the Defendants conversations where they are ridiculing her after viewing the sex video. Many of them made fun of her and her hair. This was the same time 'Kenney' had been accusing her of buy hair extensions with the child support he pays.

44. 'Kenney' had always accused Plaintiff of spending his child support on her hair. Plaintiff has discovered the Defendants using her personal information on their registered Ebay accounts which were registered under her name, partial social security number, address, her name and ex-husband, her name with references to her hair, and the name of her child. One of the Defendants remotely accessed her private email account and deleted ten years of emails between her and 'Kenney' prior to their upcoming Probate case. This was to protect him in court from the harassing and stalking emails he had sent her. Those were deleted as were the harassing texts he sent me which had been subpoenaed and sent to Probate Court.

45. She's also uncovered their accounts which use her name and allude to her being undressed such as their account named 'Ella's Naked Again LOL'. These accounts date back over ten years. The plaintiff had received over 100 emails from one of these officers or agents of Manning who was letting Plaintiff know they were viewing her in her N.H residence during 2014. He emailed her daily to repeat everything she was doing inside her home and after she had just done it. All of this is still taking place today as the Plaintiff keeps reporting them but gets no reply.

46. During 2010, Trooper David Manning instructed a criminal informant named 'Darcy' or Tippy' to enter the plaintiffs home on a daily basis to commit crimes against her and to assist with the adjusting and installation of surveillance cameras which were placed in all rooms of her home including the bathroom. Both Plaintiff and her minor child had observed Manning's criminal informant; 'Darcy', who's also referred to as 'Tippy', trying to gain entry to her back door on two separate occasions. When the plaintiff tried to file a police report on him, the local pd refused to question him and wrote false reports to protect him. This is when the Plaintiff realized he was working with Trooper Manning and the defendants.

47. The Plaintiff asserts this is common practice for these troopers, to send criminals into citizens homes on fishing expeditions and to assist with other nefarious activities. Plaintiff has

also obtained the written instructions which Manning publicly posted to this criminal informant to enter the Plaintiffs home to adjust surveillance, commit crimes, physically harm Plaintiff and to obtain a civil restraining order on her which he did. This restraining order would assist my exhusband with his bid to gain custody and relinquish his child support obligations.

48. Today she is in constant fear they will instruct the New Hampshire criminal to do it again. Trooper Manning has once again located and recruited some neighbors to continue these activities. Their current accomplice, known as 'Angel' has been recruited to assist them with the same illicit activities, crimes, and electronic harassment at her new place. 'Angel Philip', lives directly next door to the Plaintiff and upon moving in the plaintiff arrived at her apartment to find 'Angel' installing a surveillance camera outside his apartment door yet in a position which would show the Plaintiff coming and going.

49. Angel and his criminal accomplices are currently repeating the exact same actions 'Tippy' was instructed to do which include enter her home and vehicle, assist with the illegal surveillance, invade her privacy daily, and put her in fear of physical harm. 'Tippy' also installed a surveillance camera outside his door which aimed directly on Plaintiffs driveway in case she left on foot.

'50. Angel' has also been heard threatening physical harm on the Plaintiff in an attempt to assist Manning with his desire to silence her as she continues to seek redress for the injustices committed against her and her child. During a time she was away for a week she returned to find dirt and water in her sinks as well as small items which had been removed from her home. These items include flash drives, SD cards, and items the officers may have felt held evidence on them. The mere fact that a laptop was left in place, yet a thumb drive and SD card was removed shows it wasn't a common criminal stealing but someone intent on locating any evidence the Plaintiff may hold on the officers. These items had been in the same location for months before they were

removed. Another incident involved her being away 24 hours she only to return home and find a drill sized hole was placed close to her shower head. She feels was done for harassment purposes and to let her know they were inside her home.

51. Plaintiff has also uncovered an email between one of these criminals which she believe belongs to Manning and his group. Plaintiff also receives daily messages at her current location which describe what she is doing inside her home. Upon leaving her home she locks the door and sets additional traps inside where someone would have to disturb to enter her place. Each time she returns these traps are disturbed and items damaged or missing. These officers and their agents continue engaging in these practices because they're being allowed to by the State of Massachusetts who hasn't investigated the Plaintiff complaints.

52. These paid police informants have been and continue to embark on thievery and fishing expeditions to enter citizen homes for cops who prefer to ignore the law, bypass the warrant process, and violate the rights of the people. Since reporting Manning's new C.I. Plaintiff has received threats to be "shot in the face" and "killed" with his comments and abuses immediately increasing upon Plaintiff mailing in new complaints and evidence on these officers. Plaintiff asserts it's Manning who is the ringleader to what is going on today and it's he who is recruiting these current criminals to harass and break into her home.

53. The informant 'Angel' has also been outside Plaintiffs apartment door yelling "I've seen the videos of her" and he's referencing the videos Trooper Manning filmed of her. He's yelled the same derogatory insults and nicknames which Manning has labeled Plaintiff such as "prostitute", "whore", and "gorilla". Angel stood outside her door saying loudly "He has to go out and get some gorilla biscuits" for her. He repeated "gorilla biscuits" numerous times and Trooper Manning has an Ebay account under the name 'Gorilla Biscuits'.

54. The Plaintiff has moved numerous times due to their relentless campaign of hate, retaliation, and their unconstitutional misconduct. These are brutal and oppressive tactics and violations of the Plaintiffs rights by officers who have no regard for the United States Constitution they took an oath to uphold. These past actions and threats are creating anxiety which contribute to her inability and apprehension about returning home. She has not been home in almost a month due to their harassments and threats. She does have the officers online blog describing what the Plaintiff was doing in her kitchen immediately after she did those action. She also holds numerous emails from one of them using a fictitious name to let her know she is being watched in her home and auto during 2013 and 2014. Normal police investigations do not entail the officers letting you know they are watching you, cyber stalking and harassers do. These officers and their agents are intentionally violating rights which are deeply entrenched in the legal system and our country and doing so all under a guise of a legitimate police investigation.

55. Plaintiff does know the Defendants on a personal level having interacted and socialized with them in the past and she is aware they all have their own motivational factors for joining this campaign to assist her ex-husband and to inflict punishment in order to silence her.

56. Plaintiff would also like the court to be aware that aside from her reporting the aforementioned deprivations and abuses, she has also been reporting these Defendants and what she views as corrupt and unethical practices within the Government. This includes the Defendants pay transactions with those in the Fuel & Energy Sector, fuel shipping, large construction companies, those in charge of procurements, government bids, and cops working for private investigators on the side while on and off their normal duties. She's uncovered thousands of fraudulently registered corporations which do not exist. These businesses were registered and signed by this group using fictitious names with some businesses under Plaintiff's name. Plaintiff feels they are making excuses and trying to justify their endless surveillance to

silence her on all fronts including her reporting of corruption. Plaintiff feels after ten or more years of 24-7 surveillance in both her homes and vehicles they should have ample evidence to charge her with a crime if shes committed one.

57. She claims one of the reasons they're doing this is to protect Defendant Kane. He's one of the troopers who is at the top of this side business between private investigators and police. Plaintiff sent a gift Kane had given her back to him at his home residence. He fears she will send the other items he had given her back to his home which his wife may receive in the mail. Defendants also want to silence her to ensure the suspected corruption, atrocities, and human rights abuses they've committed against her are not exposed. Since they are not able to silence her and are aware Plaintiff is now reporting them to Washington D.C., they only way they are able to stop this is to follow her around to see where, when, and how she is submitting her next letter. This way, they are able to intercept it so it's not received. The second reason is to protect Kanes wife from finding out about his relationship with Plaintiff during 2006 & 2007.

58. As long as they view her in the process of a mailing, it's easy for them to use their police powers to ascertain who the letter is addressed to and take it from there. If they have nothing to hide this wouldn't need to be done. If they have nothing to hide Plaintiff wouldn't have been ignored for six years. Plaintiff is the one who's asking to be heard and if they claim she is or has committed a crime she wonders why they're not interested in questioning her. The truth is the Plaintiff is not committing any crimes and they are constantly "watching" her because they are engrossed in their own agendas, their own protections, and to oppress her to the point she's unable to live a normal life.

59. As soon as Plaintiff filed her first report on them during 2010 there have been numerous threats to cancel her SS Disability Benefits. These threats have continued the last six years. Daily and weekly comments were being made to her when she cooks inside her home, does

chores in her home, drives, takes a walk, washes dishes, or carries a bag. When she goes to the market for food, she's receives messages telling her "She's well enough to work" for being able to go to the store. However, if she remained in bed due to pain such as the months following a surgery she had, they would send messages to her online and call her lazy, telling her to shower, and telling her to get a job. A citizen is a allowed to work, exercise, go to school, and do chores while on disability and there are different levels of disability as well. Knowing this, the only possible motive for these continued threats would be to silence, harass, and intimidate Plaintiff with the loss of her income.

60. They've listened to her private doctor appointments via her cell phone and put her medical information online. During one appointment she advised her doctor that she didn't have enough money to buy a prescription only to return home to online messages which read "Well pay for your prescription", "Better yet, why don't you go kill yourself since nobody likes you" Plaintiff refuses to see a doctor due to lack of privacy unless she has to. When she cried at home they'd ridicule her and send messages to her computer calling her a "squealing pig" with some of them doing the same to her 15 year old daughter. She won't go to local police anymore since they get to them before she does, so she is alone with no help in this matter. Her brake lines have been cut twice since 2010 and vehicles damaged over twenty times since 2007. Manning had publicly distributed Plaintiffs five digit door access code to her vehicle so others could enter it at will. She is forced to move yearly due to fear and to try and escape the oppressive actions. She's had round the clock surveillance placed on her for over ten years and based on the actions of this group it's to prevent her from enjoying her life, exercise as she's been ordered to do by her physicians, and it's done to terrorize her and to wear her down. They have ten plus years of videos and audio including Plaintiffs private home life and vehicles with these officers claiming to need more. What would be the motive to continue this year after year on a woman who only

associates with immediate family, has no visitors, doesn't drink or do drugs, and is usually bedridden.

61. These officers have allowed and continue to allow known dangerous criminals to enter Plaintiffs home and appear to get free reigns to commit crimes and deal drugs so long as they comply with Manning's instructions. Her current neighbor is a known drug dealer and one who is currently working for them. In her previous place they recruited a level three sex offender who entered her place and stole a thumb drive and SD card which they probably assumed had evidence on them. Plaintiff has to bring her all of her personal belongings with her everytime she leaves her home due to so many past thefts and their stealing evidence she has on them.

This is America, where by rights a person is 'innocent until proven guilty', and not 'guilty until we can prove her innocent' as these officers seem to think it is. This couldn't be clearer, a group of officers and private investigators who hold personal grudges against the plaintiff making excuses for their need to have eight or more years of round the clock surveillance with the hopes of finding a crime.

There are thousands of criminals wanted within their own jurisdiction of Massachusetts who are currently listed on their 'Most Wanted' site. There are thousands of them shown on the pages of this site who are currently wanted for committing major crimes, including; bank robbers, fugitives, thefts, assaults, ATM & ID fraud, and counterfeiting. But these officers and investigators prefer to ignore their legal restrictions to go out of state in order to surveil and illegally enter the home of a woman who is committing no crimes. Plaintiff asserts these many years of their surveilling her was not likely to be approved by a State Police Barracks because those who have a vested interest in the outcome of a case are advised to walk away from it.

64. They're full of accusations to distort, justify, and cover up their abusive police tactics but with all of their round the clock surveillance Plaintiffs never been charged with a crime. The truth of the matter is that it's been the Plaintiff actively pursuing them and trying to be heard by sending hundreds of communications which went ignored. She's also volunteered to submit to a polygraph with regards to her assertions but the only response she received was more aggressions. They've surveilled her with and for her ex-husband since she's separated in 1998, they've pursued her longer than some known mobsters have been pursued, they have a disproportionate amount of police and private investigators pursuing her, they've let drug dealers, rapists, and violent sex offenders go to pursue her, Kane had pursued her for a romantic relationship, and yet she's never been charged with a crime. I'd say it shows where their priorities are.

65. The Defendants also bribe and threaten witnesses into "going along" with them and warn other officers who do their jobs the right way to abide by the 'Blue Wall of Silence'. Some have been instructed to say Manning's targeting her for disability reasons instead of 'bathroom' reasons. Plaintiff has reported these officers threatening and coaching others on what they are to say in the event they are questioned. Plaintiff has submitted to both the Attorney General and Department of Justice these actual conversations written by Manning and his agents to lie about the Plaintiff to discredit her and to hide the truth. As the years pass Plaintiff has noticed they are altering accounts and information to discard evidence she holds on them. This could be another reason she's been ignored, not only have they had evidence she had on them stolen from her property, this buys them time to delete a lot more.

66. This State Police Organization refused to acknowledge a rape threat towards the Plaintiffs 15 year old daughter which was sent to them numerous times and posted to their Facebook account. The troopers and investigators false assertions of this being a legitimate investigation is

say in the event they are questioned. Plaintiff has submitted to both the Attorney General and Department of Justice these actual conversations written by Manning and his agents to lie about the Plaintiff to discredit her and to hide the truth. As the years pass Plaintiff has noticed they are altering accounts and information to discard evidence she holds on them. This could be another reason she's been ignored, not only have they had evidence she had on them stolen from her property, this buys them time to delete a lot more.

66. This State Police Organization refused to acknowledge a rape threat towards the Plaintiffs 15 year old daughter which was sent to them numerous times and posted to their Facebook account. The troopers and investigators false assertions of this being a legitimate investigation is a distortion and attempt to cover up their questionable activities under a guise of legitimate police operations.

67. This makes no sense, a disproportionate force of police and private investigators hold eight or more years of surveillance and yet they still lack enough evidence on Plaintiff to charge her. They feel they have the rights to violate, occupy homes, and destroy citizen property and get away with it. The truth is it's never been a legitimate and it's time they are restrained from continuing. Plaintiff's child has been affected badly as well. The first thing Kenney he did upon Plaintiff giving up her child support was to deny his daughter entry into his home on her first weekend back from school. He claimed "it's not a good time for it". The child had no place to go and this just happened after Morrissey and Kenney were in Probate Court with claims the child had lived with him for a year. Morrissey engaged in despicable abuses of process within Probate Court with the help of the other Defendants.

67. Child was doing well in school until moving in with "Kenney'. She was warned after her first semester she was failing her classes and may not be able to attend the school unless her grades pick-up. Today she's making claims of being depressed, upset, and angry with her living

arrangements. She misses her mother and has no current plans to return to school this September. Such abuses of unconstitutional misconducts of this magnitude do not only have an effect on their direct target but on many innocent citizens, their families, but society as a whole. The child witnessed the trauma of her mother in tears, the daily abuses towards her, endless fraudulent court cases, the criminal entering her home with no one helping, the destructions of their properties, and the false arrests at the hands of these defendants which had a very disabling effect on her. Upon arriving home one evening Plaintiff and child arrived home with Manning's criminal still trapped upstairs. Plaintiff had to get child out of the home on a dark cold winters night without shoes on her feet. They left to stay at her grandmother's home to be safe for the night.

68. Having knowledge some police are doing this to its citizens is one thing for an adult to accept but it's another for a child to accept and understand. It's traumatic for a child to wonder why those who are supposed to help citizens were hurting them and why the police were not helping to prevent this scary criminal she witnesses trying to get into her back door. Plaintiffs child had crimes committed against her as well during their never ending and seemingly obsessed pursuit of her mother. Officers were also commenting on her daughter in the shower during the time they were sending "Tippy" in. They made graphic and accurate comments about what both child and Plaintiff did while taking a shower. One included an officer writing "She pees in the shower" and the other "She shaves her toes". They do this as soon as Plaintiff signs on to her computer. The Plaintiff and Defendants used Craigslist on regular basis and many comments were placed on this forum. After the 'toe' comment, Plaintiff then went to ask her daughter if she shaves her toes to which she replied "Yes". Plaintiff asked if she does it while she's in the shower or outside to which she replied "While in the shower". This is when Plaintiff learnt about their 'all weather devices' which can be installed inside a shower. She also holds proof they have devices of this sort.

69. During October of 2010 they were also discussing what she was wearing and what they wanted to do "sexually to the 15 year old girl". Plaintiff feels they were trying to anger her since she knew Manning was sending the criminal next door into the home to assist them. She feels they said it because they wanted Plaintiff to go after him for writing that stuff about her 15 year old child. Had she gone after the criminal for his vulgar remarks about the child they could have charged the Plaintiff with a crime but she never did go after him as they wished.

70. Instead, Manning instructed the criminal to file false charges and obtain a restraining order on her. Plaintiff has uncovered the connections and pay transactions between Kane, Manning, Cerullo, and Long to his Probate Attorney Kathleen Morrissey. The same attorney who made numerous and knowingly false claims in court with one being that the child lived with her father. These actions are for retaliatory reasons by the troopers and their superiors due to Plaintiff daring to point fingers and expose the Massachusetts State Police for not only violating their own laws and policies but accusing them of depriving the rights of the citizens of the United States. She's submitted ample evidence and they've not replied. Their only reaction is to administer more abusive treatment each time she submits a complaint. Morrissey is very close with Kane and Manning. Although Kenney and the Rockland Police Department failed to write reports on this 'Tippy', Morrissey was sure to go into court to try and get custody by using "the dangerous man next door". The very man Defendant Manning was sending in.

71. The truth is, The State Police had no desire to investigate the deprivations, crimes, or the rape and the death threats because a they're aware a proper investigation may come back to their own. This would mean more court cases, trials, and possible convictions during a period where thirty troopers have been arrested during the last few years. Plaintiff is aware the entire force is not like these few bad apples she's dealing with and knows there are some who slip through the cracks and get on police forces for the wrong reasons. Plaintiff is always quick to

commend officers who do their jobs honorably and she blames the leadership of the Mass. State Police for a lot of their officers arrests. She fells they look the other way, do not hold them accountable in most cases, and are not enforcing the training and laws which prohibits the violations and deprivation of rights against U. S. Citizens.

One prominent Massachusetts Attorney Friedman who has extensive knowledge on the Massachusetts State Police summed it up well;

""The State Police are known for not disciplining officers," Friedman said.

Friedman said that the department's leadership is partly to blame. "Our State Police are very insular. By statute, the head of the State Police department must come up from the ranks," he said. "There's a lot of people who are professionals who move around [between different police departments]. Doesn't happen at the State Police."

72. Plaintiff has now emailed the new Colonel and Internal Affairs over twenty complaints to show Mannings connection to the drug dealer next door to Plaintiff and she's shown this group has been after her for years to assist her ex husband with his stalking habits. A part of Longs willingness to go along with this conspiracy is due to Plaintiff reporting him and his security agents who worked at Verizon when Plaintiff was a manager there. During 2000, Long refused to investigate the corporate corruption she was reporting. Long is also a former Mass. Trooper and friends with 'Kenney'. These former troopers were Verizon Security Agents and were also friends with the corrupt civilians she was reporting. As soon as they refused to investigate, the Plaintiff reported them to the Verizon President Ivan Seidenburg.

73. After six years of reporting these officers to ask for help there remains no response or end in sight. Officers and their superiors wasted six years trying to contain and silence the Plaintiff as opposed to investigating or working towards a solution. Innocent citizens are suffering whilst

Massachusetts State Police remain in denial mode. Plaintiff was only asking for her freedom and right to live and enjoy her life in a normal way. She wants to exercise to get healthier and she wanted to go back to school. She is unable to do this being followed and harassed, and since they're tied into her it's very easy for them to discard, delete, and destroy and school papers she would have done. They're currently doing this to the evidence she holds. She's simply asking them to do their jobs without ignoring their restrictions and abide by the laws they took an oath to uphold.

74. While the general term for this is "unaccountability," it reflects a sense that "rogue" has become more generalized or departmental. If a common structure to these acts of police violence can be discerned, they would lose their individuality altogether, and become evidence of departmental or national police policy. And indeed, common structures appear. For one, there often seems to be an absence of probable cause, and a clear withholding of due process. We have learned to expect multiple changes in the officer's story, complete with unexplained contradictions.

75. In the general case, by simply putting the officer responsible for any malfeasance on paid leave, and in almost all cases performing exoneration, the department is clearly looking out for its members, though claiming to do a careful investigation. When such commonalities of style and procedure become discernible, across the country, it suggests that police are not simply responding to the moment or an individual,

76. What is now wholly general is the existence in every state of enhanced obedience statutes, which are the foundation for police impunity. Under these statutes, a person who, as a matter of self-respect, refuses a police demand that is humiliating can be charged with disobeying an officer and arrested – that is, criminalized for affirming self-respect but rather are enacting a prior project for which there has been more universal training.

77. It is a clear demonstration that the police have become a law unto themselves. We are no longer secure in our person in the face of that arbitrariness. This very rule, which the police trumpet about themselves and their power without shame, is itself a violation of human rights. And that means that human rights are violated on the streets of US cities every day.

In other words, the objections and reporting of these officers by Plaintiff is interpreted as resistance.

78. Having created a situation of arbitrariness to which objections and questions are relevant in terms of self-respect and human dignity, but which the police choose to see as resistance, the police have created a double bind. In the context of harassment for speech, objection is called for in the name of self-respect and self-defense, and self-defense is seen as violence, as fighting, and hence as criminal. There is an intention here insofar as the police create the situation whose arbitrariness calls forth objection, where objection means disobedience in violation of the law, where the law is one of obedience to the police, who thus become a law unto themselves. To defend one's dignity is to be criminalized, and not to defend one's dignity is to be reduced to lesser social status in the face of harassment. That is the double bind.

79. There was no due process. In a just and democratic society, a person is not to be deprived of freedom or property without due process. As that famous document states, "No person shall be ... deprived of life, liberty, or property without due process of law." For the police, due process comes afterward, if it arrives at all in Plaintiffs case. But "afterward" is not due process.

80. Due process means that one can answer the charge that can possibly lead to loss of freedom or property. What happens "afterward" is "appeal." Appeal is what one does after one feels the state has committed a wrong. Appeal is not due process, it is appeal. Due process means one cannot be deprived of freedom without a fair hearing. It means one cannot be deprived of one's

freedom without having something to say about it. But today, in police procedure, one is to be deprived of freedom because one has something to say.

81. To see the reality of the difference between appeal and due process, consider the case where the police have killed someone. Appeal then is impossible, and moot. But the person has nevertheless been denied due process in being deprived of life.

The autonomy of authority, developed on the basis of an impunity that renders it a law unto itself, can live with no competing autonomy. It is the autonomy of the state destroying the autonomy of humans. This is the opposite of constitutionality, wherein "we, the people" are autonomous. The state can now threaten and oppress us at will for speaking, with lethal power to deny our ability to say "no." Autonomy in defending oneself is then squelched by police power, acting against this insurgency of self-defense, in order for its authority to resurrect its own autonomy against this challenge to it. None of this had anything to do with law, but only with state power.

82. The significance of this structure here described is that democracy, which means equality before the law, sovereignty of person (the ability to speak in one's own voice), non-regimentation (absence of command or demand for obedience), and mutual respect (absence of demand for obeisance), has become equivalent to insurgency. In these incidents, for which the police are unquestionable in the moment, there is profiling (non-equality), outlawing of speech and angry tones of voice (non-sovereignty), and a legalized demand for obedience and obeisance. They mark a reduction of personhood as the prerogative of state sanctity, and its defense of its own self-arrogated impunity.

83. A police organization shouldn't be allowed to abuse it's citizens to in order to protect their officers. These crimes escalated upon her rightfully reporting these terror tactics, abuse of police

powers and her refusing to cower to a bunch of misogynistic officers who feel they are above the law. Manning has decided to play 'Judge and Jury', take matters into his own hands and administer his own preferred method of 'justice' by way of degradingly cruel and unusual punishments.

84. This group and their actions amount to nothing but absolute lawlessness and immaturity coupled with a feeling of being above the law which can only lead to anarchy. Officers who are working with and for the so called 'advocates of the court' are preying on women and children who don't have the means or know how to defend themselves when everyone fails them. Plaintiff is aware she is not the only citizen they treat in this manner. They've tortured and mistreated her, abused the court process to take her child from her, and endangered the child by allowing criminals into the home to commit crimes against the family with hopes of getting Plaintiff to comply. If they are able to do this to a troopers child, his own flesh and blood, then no one is really safe in this world. A nation without a viable and constructive opposition is a catastrophic Government who without being restrained further will result in future catastrophic behaviors and chaos inflicted upon the very citizens they are expected to keep safe. For years, Plaintiff has been treated worse than someone who is incarcerated and yet she's never been charged with a crime.

#### III. ARGUMENT

#### A. Preliminary Injunction Standards

An injunction is a write or order requiring a person to refrain from a particular act.

Generally, a plaintiff is entitled to an injunction if: (1) It is reasonably probable that she will prevail on the merits of her claim. (2) There is a threat of irreparable harm to the plaintiff's rights. (3) There is no adequate legal remedy. (4) The balance of equities weighs in favor of the plaintiff. All of these four factors strongly weigh in the plaintiff's favor.

#### B. Nature of the Relief Requested

a) An order or decree restraining the Defendants, their officers, employees, and their agents from further actions which include; invasion of privacy, governmental intrusions, illegal searches and seizures, restraint from needless restrictive actions and surveillance which exceed the boundaries of police power, to stay within 1.5 miles of her and her home, and to honor all of the Plaintiffs rights which are protected by the United States Constitution including her right to self-determination

- b) Prohibiting Defendants, their officers, employees, or agents, and those acting on their behalf or in concert with them from further intimidation, threats, and aggressive tactics on Plaintiff who is committing no crimes but engaged in protected First Amendment activity to petition the government and seek redress for the injustices committed.
- c) Prohibit Defendants, their officers, employees, or agents, and those acting on their behalf or in concert with them from further gross violations of Plaintiffs rights including the placement of surveillance in locations where one has a reasonable expectation of privacy and to discontinue the distribution of such footage obtained by the Defendants. Defendants should destroy all videos, photographs and footage obtained during these invasions and to cease all libelous and slanderous assertions about the Plaintiff accusing her of crimes she has never been charged with
- d. Imprisonment equivalent to the amount of years Plaintiff and child were abused and deprived of their rights. Minimum of five years for the voyeuristic misogynistic ringleader, David Manning who sexually exploited Plaintiff for many years for fun.
- e. Award Plaintiff substantial damages
- f. Award Plaintiff costs associated and arising from these abuses, violations, and deprivations.

  Award Plaintiffs child the two years child support which was their driving factor and which Plaintiff gave up due to their abuses.
- G. Grant Plaintiff such other and further relief as is just and proper under the circumstances.

#### C. <u>Likelihood of Success on the Merits</u>

An injunction may be granted when it appears by the complaint that the plaintiff is entitled to the relief demanded, and the relief, or any part thereof, consists of restraining the commission or continuance of the act complained of, either for a limited period or perpetually. It is likely the plaintiff will prevail on the merits of her claim. The plaintiff has already suffered irreparable harm and stands to suffer more if not granted. 'These actions of the Defendants have deprived Plaintiffs of rights secured under the First (freedom of speech and assembly) Fourth and Fourteenth (rights of due process and equal protection) Amendments to the U.S. Constitution

#### D. <u>IRREPARABLE HARM</u>

The function of a preliminary injunction is not only to prevent ongoing damage but to prevent prospective damage. See Nutro Products Inc v Cole Grain Co., 3 Cal. App 4th 860, 867 (1992). Irreparable harm is shown when the plaintiff is damaged in a way

which cannot be later repaired. It is axiomatic that when a private fact gets disclosed, it cannot be undisclosed. As the Supreme Court has noted, "The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." Elrod v. Burns, 427 U.S. 347, 373–74 (1976) (emphasis added); see also Swartzwelder v. McNeilly, 297 F.3d 228, 241-42 (3d Cir. 2002); American Civil Liberties Union, 217 F.3d 162, 180 (generally in First Amendment challenges plaintiffs who meet the merits prong of the test for a preliminary injunction "will almost certainly meet the second, since irreparable injury normally arises out of the deprivation of speech rights.") (citation omitted); Abu-Jamal v. Price, 154 F.3d 128, 135–36 (3d Cir. 1998) (same); 11A Charles Alan Wright, Arthur R. Miller & Mary Kay Kane, Federal Practice and Procedure § 2948.1 (2ded.1995) ("When an alleged constitutional right is involved, most courts hold that no further showing of irreparable injury is necessary."). In this case, the defendants have attempted to impede plaintiffs' First, Fourth, and Fourteenth Amendment rights.

# DEFENDANTS WILL SUFFER NO IRREPARABLE HARM IF THIS INJUNCTION ISSUES.

**a.** The requested order will not prejudice the troopers ability to maintain public safety or security. The State of Massachusetts can continue to protect public safety and the safety of it's citizens within their legal jurisdiction without unconstitutionally infringing on the rights of the Plaintiff who resides outside their jurisdiction. Requiring police to comply with the Constitution

if such searches and seizures are necessary does not and cannot constitute irreparable harm. Because the Defendants are a governmental unit and it's agents, they have no legally cognizable interest in suppressing plaintiffs' constitutional rights or retaliating against them for the exercise thereof.

#### E. <u>INADEQUATE LEGAL REMEDY</u>

In the context of injunctions, courts have held that no legal remedy can restore the privacy shattered by improper disclosure. See Blair v. Pitchess, 5 Cal. 3d 258, 284 (1971). The ongoing and future disclosure of private information relating to the plaintiff cannot be fully redressed by a damages award on it's own. It's impossible for the many people to 'unlearn' the information which Trooper David Manning disclosed and published online which he continues doing today. Thus the legal remedy is inadequate to compensate plaintiff for the loss and past loss of her privacy rights and damage to her reputation. He's made numerous libelous and slanderous assertions about the Plaintiff publicly and posted them online along with photos and videos of her. In deciding whether to grant a preliminary injunction, the court must exercise its discretion "in favor of the party most likely to be injured... If denial of an injunction would result in great harm to the plaintiff, the defendant would suffer little harm if it were granted then it is an abuse of discretion to fail to grant the preliminary injunction" See Shoemaker v. County of Los Angeles, 37 Cal. App. 4th 618, 633 (1995). The court must evaluate who is likely to prevail on merits of this case. The plaintiff has shown a high likelihood of success on the merits as well as the irreparable harm she's already suffered. The hardships clearly tip in her favor. If the injunction is not granted the plaintiff's health will continue to deteriorate and the citizens rights will continue to be violated by the the same police officers who should be preserving them.

Moreover, if the injunction is not granted, her right to privacy and right to be safe from illegal searches and seizures will continue to be violated. She will continue to be put on public display and made a spectacle of via live RSS feeds of Trooper Manning and the agents who assist him. These trespassory invasions have been committed for numerous years per the instructions of these officers, and were committed by those who have stalked and have made threats of physical violence towards her.

The essential purpose of the Federal and State constitutional prescriptions against unreasonable searches and seizures "is to impose a standard of 'reasonableness. Upon the exercise of discretion by government officials....to safeguard the privacy and security of individuals against arbitrary invasions." Delaware v. Pruse, 440 U.S. 648, 653-54 (1979). If the injunction is granted, Massachusetts State Police, by way of it's Officers, including Trooper Manning and his hired 'agents' must discontinue all illegal practices including trespassing Plaintiffs' private properties, discontinuing the unreasonable oppressive tactics, remove and discontinue all illegal surveillance currently placed on or in her personal property, home, and vehicles, discontinue invading her privacy, and acknowledge the rights as a U.S. Citizen under the due process clause and equal protection of the law found in the Fourth and Fourteenth Amendments. Refrain from the continued violations of 18 US Codes 241 & 242, Deprivation of rights under Color of Law' and 'Conspiracy against Rights'.

#### IV. The Public Interest Is Served By The Granting Of Injunctive Relief

The granting of a preliminary injunction will benefit the public interest. It is in the public's interest to protect constitutional rights. See Hyde Park Partners, L.P. v. Connolly, 839 F.2d 837, 854 (1st Cir. 1988) ("obviously, should the statute be unconstitutional, the public interest would

be adversely affected by denial of ... an injunction"). Granting injunctive relief in favor of Plaintiff would protect the sacred rights to due process, equal protection of the law, and safety of the citizens to be secure in their persons, houses, papers, and effects. Lawless actions such as these if not contained and allowed to fester is what leads to civil wars and anarchy.

Justifying the creation of a voyeurism scheme in the *Criminal Code* involves a consideration of the harm that such a scheme is intended to address. The harm can be assessed as the breach of a right to privacy that citizens enjoy in a free and democratic society; alternatively, retaliatory voyeurism and exploitation should be conceptualized as a sexual offence. Citizens need to be protected from those few officers who use police surveillance with grave intent, to humiliate unsuspecting women for their own sinister gratification.

Thus, the public interest is best served by the granting of injunctive relief.

#### PLAINTIFF REQUESTS TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

#### **CONCLUSION**

WHEREFORE, as Plaintiffs have satisfied the four prerequisites for issuance of a preliminary injunction, this Court should issue a preliminary injunction to enjoin the Defendants along with their officers, employees, agents and assigns from engaging in retaliatory conduct against the Plaintiff designed to chill the exercise of her First Amendment Rights and refrain from all unconstitutional actions which deprive her of her Fourth and Fourteenth Amendment Rights.

For the foregoing reasons, I respectfully request that the Preliminary Injunction be granted.

Dated July **2**5, 2016

Respectfully submitted by,

Lisa A. Kenney, pro se 48 Henriette St # 202 Manchester, N.H. 03102

(603)-854-0914

**AFFADAVIT** 

Lisa Kenney makes her statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts, and things set forth are true and correct to the best of her knowledge.

The Plaintiff is still trying to seek justice for these injustices and abuses she's dealt with yet after six years she still has received no reply. The below shows their intent to obstruct justice, deny my right to be to be treated equally under the law, and to deny me justice for the wrongs committed. The reaction Plaintiff received from the police upon reporting the crimes and abuses Committed are below.

**2010** - Rockland Police refusing to write a report and threatening to send a cruiser to her home for questioning why they wouldn't write a report on a man she found following her who was tied to her ex-husband.

**2010-** Rockland Police wrote a false report when Plaintiff reported C.I. 'Tippy' breaking into her home. Officer wrote the criminal wasn't home but the officer never checked. The C.I. and Plaintiff shared a duplex and he was next door. The officer was advised he was home at the time but instead of going next door to question him, I saw him walk straight to his cruiser.

**2010-** Rockland Police wrote a report claiming Plaintiff was "out to get C.I." who was breaking into her home.

**2010-** Plaintiff sent an email to Defendant Kenney as well as the Rockland Police Chief to ask for help with the criminal next door out of concern for their child. All emails were ignored.

2010-MSP Internal Affairs- Plaintiff reported the harassment at the hands of 'Kenney' as well as these officers in her bank account. Plaintiff also mentioned Defendant Manning. Plaintiff received a letter denying this was taking place with I.A. claiming to investigate matter. Bank security advised Plaintiff he never received an inquiry from MSP. During their meeting Dave Debuccia suggested she "Stay off your computer" to remedy the situation.

**2010-** Numerous calls to MSP Internal Affairs to report intimidation tactics as well as one call to report a man chasing Plaintiff in his SUV on the street. These calls were rejected with one Captain calling her back to ask her if she is on drugs. Plaintiff found his online communication with the harassers.

2010- Call to the FBI to report these officers hacking her bank account was met with laughter from the 'agent' who advised her to ignore the officers and asking why they would risk their jobs for her. Plaintiff believes that call was intercepted by one of the troopers using their police technology to answer 'as the FBI' in order to prevent her from reaching them. She has submitted this information to the FBI in hopes they would investigate the possible impersonation of a Federal Agent.

2011- Several letters of complaint to the AG and DOJ went 'missing' after someone signed for them. Plaintiff holds the signed receipts for these and has the officers communications with one of them online. Most of her complaints were never found or they had 'no record' of receiving them although she holds signed receipts showing they were received.

**2011-** Plaintiff arrived home to several items found on her floor and a table pushed aside. Boston Police showed up one hour after the call and laughed at her. This was reported to Boston Mayor Tom Menino. Four months prior the troopers told her they would ensure police wouldn't arrive for one hour if she ever called for help.

2012- AG LT. Michael Cooney arrived at Plaintiff home to ask her to "Stop sending letters of complaint to Ms. Coakleys home". Plaintiff did so because the letters she was sending were being intercepted and tossed aside. Plaintiff advised Cooney she's being harassed and abused by troopers and she will continue to send them as long as these crimes continue. Each time she mentioned the crimes and harassment he ignored her comments. AG Cooney and MacCauley also suggested she "stay off her computer for a while". Plaintiff continued sending letters to the AG as well as Cooney who never replied. Letters which consisted of the graphic bathroom comments Manning was sending her.

**2012-** Norwell Police Officer Clarke arrived at Plaintiffs home to do a 'wellness check' on child. Child and others had already advised 'Kenney' where she was and whom she was with. This was done for show during Kenneys Probate case, to have a wellness check of the child on record, but he knew the child was safe because she had just told him.

2012- After reading the officers online communications planning to have Plaintiff arrested she notified the Attorney General to report this. This was three weeks prior to their following through with it. No response.

2012- Within 3 weeks of uncovering their plot to have Plaintiff arrested, her housemate

made the false claim she was assaulted but it was the housemate who assaulted Plaintiff. Plaintiff contacted Chief Ross of Norwell Police and told him she was assaulted. He promised to send someone out but he never did. Within one hour of notifying Chief Ross, Officer Clarke, arrived at the home to arrest Plaintiff in front of minor child. (Clarke is the same one who did the wellness check on the child). Both Ross and Clarke are friends with the Defendants.

During the arrest, minor child was crying and asked Officer Clarke why he was arresting her mother, Clarke replied "When I see an egg sized lump on a persons head- someones getting arrested".

However, the police report read, "There were no physical injuries observed on victim" which there wasn't because an assault never took place. Plaintiff was found not guilty. Plaintiff does have these Defendants and their agents communications with the woman who made up the false charges. Her husband is friends with Defendant Kenney and Defendant Long.

**2013-** Brockton Police- Plaintiff tried reporting a break in to her home where one of Mannings agents dropped a cell phone behind and stole items. Officer rejected the cell information and wrote "nothing was taken from her home". Manning previously worked for this department.

Knowing she couldn't get an attorney to help her she received a public defender on the "false assault'. Attorney and Quincy City Councilor Brian Palmucci works and lives in the very city where Defendant Kane grew up. He denied knowing Kane when Plaintiff asked him. Although this case lacked evidence, Palmucci tried to get Plaintiff plea to a lesser charge and admit guilt. He was also making snide remarks to her and was not defending her properly. Plaintiff then had him resign and later found the ties between Palmucci and Kane.

A different attorney was then assigned to her case. This attorney demanded she agree to a bench trial and when she refused he resigned on her. Plaintiffs mother was present at this time when Plaintiff advised attorney she only wanted a jury. This she feels was done at the request of the Defendants to make it appear as the Plaintiff being hard to represent. Plaintiff has also reported these officers hundreds and thousands of pay transactions with attorneys and those who work in the courts.

Six years later, and after Plaintiff sending hundreds of letters, calls, emails, faxes, and completing online complaint forms to all investigative offices including the Department of Public Safety, State Police, State Police Colonel, State Police Internal Affairs, Attorney General, FBI, Department of Justice, and any investigative office she felt could help, she's never received a reply. Plaintiff is now trying to obtain help from Washington D.C. . She's heard rumors that after all her complaints and documents on these abuses the Defendants were told to cease their activities but since no one replies to her she is unable to confirm this.

A police organization shouldn't be allowed to abuse it's citizens to in order to protect their officers. These crimes escalated upon her rightfully reporting these terror tactics, abuse of police powers and her refusing to cower to a bunch of misogynistic officers who feel they are above the law. Manning has decided to play 'Judge, Jury, and Executioner', by taking matters into his own hands and to administer his own preferred method of 'justice' by way of degradingly cruel and unusual punishments.

This group and their actions amount to nothing but absolute lawlessness and immaturity coupled with a feeling of being above the law which leads to anarchy. They're preying on women and children who don't have the means or know how to defend themselves when everyone else

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fails them. Plaintiff is aware she is not the only person they treat in this manner. They've done it

her, and they've allowed not only the endangerment of a child by allowing known criminals to

enter their homes, but they also allowed them to commit crimes against the child with hopes of

getting Plaintiff to comply.

If they are able to do this to a troopers child who is his own flesh and blood, who's really safe in

this world? A nation without a viable and constructive opposition is a catastrophic government

who without being restrained further will result in future catastrophic behaviors and chaos

inflicted upon the very citizens they are expected to keep safe.

"The claim and exercise of Constitutional Rights cannot be converted into a crime. Miller v.

Kansas 230F 2nd486,489"

"State Police Power extend only to immediate threats to public safety, health,

welfare, etc., Michigan v. Duke 266 US, 476 LED. At 449:"

Maine v. Thiboutot 448 US 1, 100 SCT 2502 - Officers of the court have no immunity when

violating a constitutional right from liability. They are deemed to know the law.

"In the United States the right to petition is guaranteed by the First Amendment to the United States Constitution, which specifically prohibits Congress from abridging "the"

United States Constitution, which specifically prohibits Congress from abridging "the"

right of the people to petition the Government for a redress of grievances".

.Dated July 24, 2016

Lisa A. Kenney

48 Henriette St # 202

Manchester, N.H. 03102

603-854-0914

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#### EXHIBITS A, B, C

Please view EXHIBIT B for the actual photos of Trooper David Manning's public posts to his
criminal informant as they did not print with the document.

- A. Explanation of troopers posts
- B. Photos of his posts
- C. Actual Ebay account screen shots owned by these officers with the names used in the public posts.

#### **EXHIBIT A**

Plaintiff has dealt with these officers for over ten years and is very familiar with their behaviors. When they engage in their illegal and unconstitutional behaviors, they confine most of their communications to one another online only. This enables to hide any communications they have with those they shouldn't and when they're planning actions which either are not approved by the barracks or actions they shouldn't be engaging in. These officers also distribute laptops among those who assist them and they use unregistered or unlocked SIM cards to go undetected. Therefore, if they are ever questioned, they offer up their personal devices where nothing will be found.

For these reasons, as well as the fact that no investigative office will help Plaintiff, the only way she can connect these officers is through their PAYPAL and EBAY accounts. Thirteen years ago, co-workers of Plaintiffs ex husband who are troopers were buying items from her Ebay account using fictitious names and locations to hide their identities from her. She's obtained hundreds of the officers accounts this way which led to her finding the others.

Over the years Plaintiff has collected at least 20 million of their Ebay transactions and she asserts many of these accounts are Ebay 'stores' used as fronts in order to do an online banking or PAYPAL cash transaction behind the scenes. Many of these officers are not selling anything in their stores but it's a way they pass money to one another. Plaintiff has uncovered thousands of these transactions amongst all of the Defendants.

Below you will see photos of public posts Trooper David Manning wrote to the criminal who was sharing a duplex with Plaintiff. These are more of their online communications with the criminal they were instructing to break into my home to steal, commit crimes, harass me, and adjust and install surveillance in Plaintiffs home and bathrooms. It's important the true mentally of the ringleader to all of this, Defendant David Manning is shown. Although only four are posted, Plaintiff has many more of these which are much more graphic, vile, sexist, hateful, and disgusting. These are inciting words right from a

Massachusetts State Troopers mouth and intended to inflict harm, ridicule, and humiliation on the Plaintiff. Manning is the one who is currently instructing the drug dealers in Plaintiffs building to break into her home and do the same things which have been done to her for years. The instructions are for a man the troopers refer to as 'Tippy' or tipster, as in a criminal informant. Manning is obsessed with the Plaintiff and has told her four years ago he's going to do this no matter where she moves to so long as she keeps reporting them.

Plaintiff asserts everything which was written in these posts was done to her by 'Tippy' and Manning gave him instructions to enter her home on a daily basis. Plaintiff explains each post and what the post is advising the criminal to do. Since she's dealt and communicated with these officers online, she understands the sometimes cryptic way they write to get a message across. Because they are police officers they must take care while instructing criminal element to attack and abuse innocent citizens, therefore they write in a way the criminal understands but your average citizen reading it may not. This entire group communicates on Craigslist and has for many many years and Plaintiff has been dealing with them there as well. In fact, it was on Craigslist where they began the online stalking of her years ago.

Due to Plaintiff knowing and understanding their writing styles as well as having collected millions of their Ebay transactions, she's aware they also assume their subjects names and things associated with them (in this case Plaintiff) when they register their Ebay account names. For example, these Defendants have numerous Ebay accounts under her name and personal information which dates back to her separation from 'Kenney'. Trooper Manning used her name on an account during 2001 and he has close ties to Defendant Long. They all have one thing in common and that is the Plaintiffs ex husband and they all did what they could to ensure his child support obligations were dropped.

Plaintiff has also supplied the Ebay account names which go with these posts and are located with Exhibit B. Again, because she's had to investigate everything herself, this is the best way she can connect this group. She is certain the Ebay accounts belong to Manning and the Defendants but most of them are

owned by him. This group is in the process of changing all these accounts so it's important to stop officers such as this before they harm more people.

On the first post he's titled it 'First Amenment is not for Assholes'. Manning is able to spell very well but he left out the d in the word amendment because the d represents his first initial. They typically give an identifying feature while online to let others know who has posted it. This was written during the time Plaintiff started reporting their crimes and abuses towards her and child. Essentially he's saying the First Amendment does not apply to the Plaintiff. He wrote "how can we support your pleas for support" which is a reference to her pleas for help. He goes on to speak of her cellar which is where the child slept and where the criminal was searching all of the time. Her pc and router was located there as well and he was instructed to abuse the ip and hack into them. Basically, he's saying the Constitution First Amendment does not apply to her and they will do all they can to ensure she's not protected. He uses the words 'scofflaw' and 'LADD' here. Plaintiff has found Ebay accounts under both these names which are owned by Manning.

On the post directly below it he writes about bothering little girls and innocent people, Mannings actually instructing him to do this. He'll write as though he's talking about someone else, such as writing 'he or him" but he's referring to the Plaintiff while trying to cover it up at the same time. He has to, he's a police officer with a vengeance instructing one to commit crimes.

H

The criminal was seen looking in the childs window and stalking both Plaintiff and child. He was also seen trying to enter their back door on two occasions. Manning wrote "you'll be visited soon and feel the pinch of the law" with many references to 'mentally ill' and one needing to be committed. During 2010 Plaintiff was warned by them they will tell everyone she's "crazy and on drugs so no one will believe her" and this is what they're doing. The plan was to do horrible things to them so when she reported the truth no one would believe her. He wrote they're "glad the authorities put a lid on your antics" which most likely means cops blocked Plaintiffs complaints which he referred to as 'antics'. Most of Plaintiffs complaints went missing when she called to follow up on them.

On this post you will see the words, miscreant, scofflaw again, tippy, Howdy Doody, and sleazoid. Plaintiff also has Ebay accounts under these names which are owned by Manning. See Exhibit B. On the small third post he again writes about her being mentally ill and mentions LSD in this post. Plaintiff also has instructions Manning wrote to this criminal he wanted him to "poison and harm the public" which was also directed at the Plaintiff. She wonders if he was instructing him to not poison their food, but perhaps put drugs in them, because this was at the height of Plaintiffs child custody and support case with Defendant Kenney. If drugs were found in the home or her system he would surely get custody. They're not beyond this as they were also behind the three false charges on Plaintiff. Again, Plaintiff holds Manning and his 'agents' Ebay account named Porky Pig, Howdy Doody, and Tippy which are found here.

On the second photo he speaks of queers, fags, gays, fat pigs, and the like. This is the true voice of Trooper Manning and for every name on this post, such as McGoo and the rest, Plaintiff has an Ebay account under the same name. He speaks of someone's guilt and refers to himself as an "Altar Boy' in this post as if he could do no wrong. Plaintiff also has his Ebay accounts under the name 'altarboy'. Just under the 'queer' post you will see a partial one titled "I was dumped by a fat slob". Plaintiff has the full post and will provide it at a later date but Manning referencing when Plaintiff dumped him after a few dates and laughed about it to her friends. Had he not been illegally listening to her calls and accessing her emails he wouldn't have known this. Manning has used the Kenney name on one of his account which dates back to 2001, so he was assisting Defendant Kenney back then, but Plaintiff enraged him during 2007 when she ended the relationship and made fun of him to her friends.

On the third photo down you will observe two more of Mannings posts with one of them beginning with 'Tippy, u love making phone calls'. Plaintiff had received harassing calls on a daily basis and submitted a full page of phone numbers who were showing up on a daily basis. This is one post where he's indirectly referring to the movies they were filming in Plaintiffs bathroom with tiny hidden cams. As mentioned in this complaint and Plaintiffs 2010 and 2011 complaints to the AG, they would mention when both her and her child were menstruating in full detail and placed it online. He mentions Kotex here which is a supplier

to the items a woman will use for this and he's written 'bulldyke' 'HXXX, and big ham. One of Mannings nicknames is Hank and the H stands for Hank with the XXX being for rated X. Plaintiff holds Ebay accounts under the names Kotex, HXXX, HDXXX, and Big ham which are owned by Manning and this group. He's also been spreading rumors she was gay and frequently called her a 'bulldyke'.

On the next post directly under it he references 'tippy mcgeel' and writes about a realtor going to his home to throw him out as "he has no lease". After this post was released the criminal entered Plaintiffs home and stole her lease. Within two weeks, the homeowner Plaintiff rented from, sent her a registered letter which needed to be signed for. Since the lease had just been stolen, Plaintiff suspected this registered letter was going to be an eviction with a claim there "was no lease", so Plaintiff never went to sign for the letter. The homeowner is friends with Defendants Kane and Manning. Evictions would also help 'Kenney' with his bid to get custody. Plaintiff also has their Ebay account names under 'McGeel, 'chop-chop', and 'stoolbums' which are mentioned on this post.

4

The stool bum Ebay account has now been discontinued or the name changed. This account originated 7.5 years ago and was listed with his location as PA. Because this was another one of his bathroom accounts which alludes to the bathroom surveillance he was engaging in, his 'stool bum' account was discontinued or altered after Plaintiff found and reported it.

To change names or discontinue an account in Ebay typically takes a very long time, so what this means is he is getting rid of all the evidence he can in order to hide what he's done. He's also done the same thing with the account named 'ELLAS NAKED AGAIN LOL' and he changed it immediately after Plaintiff located it. He changed it because he refers to her as "Ella" at times and this was an account tied to his distributing the naked footage of her to hundreds of people.

You will see Manning references 'rotten ham' on his posts as well. They've altered that account on the same day account 'STOOL BUM' was changed. Not only are they stealing and deleting evidence she has on them, they are altering other types of evidence they know she has but is out of their reach. If they had the

chance they would enter Plaintiffs home to remove it as they've done so many times in the past, and this is one reason they're sending criminals into her homes to steal flash drives, SD cards, paperwork, and destroying her computers. This is another reason a Preliminary Injunction is necessary. Plaintiff cannot leave anything at her home due to their theft and in the event of a trial, she needs the remaining evidence.

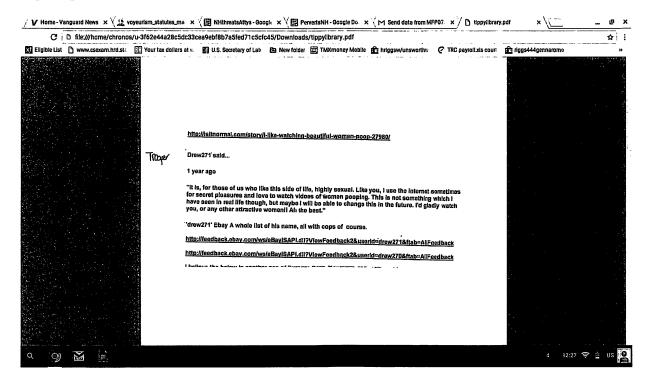
On the fourth photo Manning again alludes to mental illness again because this is their plan. In fact, Attorney Morrissey told Plaintiffs Probate Attorney Plaintiff was "insane" prior to her ever meeting her. He's also writing about "harassing and libelous assaults" which are the complaints Plaintiff had been sending for two months prior. The last sentence of the paragraph reads "He is ill-NOT a criminal", because again, the plan at the time was to make Plaintiff appear insane. Rest assured this will change to "she's a criminal" in court.

(3)

On the very last photo and paragraph he wrote, "This Tippy Falone, why cannot the official execute a civil restraining order upon the scofflaw. Someone get this 'guy' restraining from writing inflammatory remarks!" Again, he's not writing about a man, he's trying to disguise the commands he's giving. The inflammatory remarks he needed someone restrained from writing was the Plaintiffs complaints and the criminal did file for a civil restraining order on Plaintiff within two months. He didn't have the chance to sooner as Plaintiff tried to avoid him.

He also wrote "Obtain one more search warrant for his IP number" and that's simply more instructions for him to enter the home in order to tie into Plaintiffs pc and search the basement where the child slept. He wrote "PREVENTION- is an area we must look at" and someone needing a 30 day observation. They did all they could to prevent Plaintiff from getting her complaints through including intercepting her letters. Plaintiff asserts they did so many horrible things to her that she couldn't report them since she knew no one would believe her.. Plaintiff also holds Ebay accounts under the name Falone. Plaintiff has many more of these which are a lot worse and show extreme anger and rage directed towards her.

The first photo below is from an officer who Plaintiff believes is Manning discussing his desire to watching women on the toilet via video. She holds many of these officers expressing interest in the same and this they've done to her and her child. On the photo below that one one he writes "What goes aroun comes aroun ", again omitting the D and he explains how "she is walking into a den of snakes, she ordered it, and it'll be served by her allies", the "same ones she thought would help her". He also refers to "this pig he caught". This is his rage and revenge. Plaintiff also has 'snake den' accounts and more XXXX accounts. Paper copies will be included in case these can not be viewed well.



## EXHIBIT B

Troopers took down their chart + changed their Elbay a copint Names after Plannike Pound it.

### http://isitnormal.com/story/i-like-watching-beautiful-women-poop-27980/

Trooper

Drew271' said...

1 year ago

"It is, for those of us who like this side of life, highly sexual. Like you, I use the internet sometimes for secret pleasures and love to watch vidoes of women pooping. This is not something which I have seen in real life though, but maybe I will be able to change this in the future. I'd gladly watch you, or any other attractive women!! All the best."

'drew271' Ebay A whole list of his name, all with cops of course.

http://feedback.ebay.com/ws/eBayISAPI.dll?ViewFeedback2&userid=drew271&ftab=AllFeedback http://feedback.ebay.com/ws/eBayISAPI.dll?ViewFeedback2&userid=drew270&ftab=AllFeedback Please report suspected exploitation of minors to the appropriate authorities

accounts

# Just a reminder to Tippy Canoe (You're O-U-T. tippy!Out)

Pate: 2010-09-08, 12:43PM EDT Reply To This Post

http://providence.craigslist.org/rnr/1942966462.html

TIPPY, WHAT GOES AROUN COMES AROUN'. youse is fucked ma man1 and you are so fucking fucked up over it! Everyone in RI, that hates you is happy. Happy you started to get fucked the way you deserve. I'm exhonerated by your assholeness. just as i will be by a certain other jerk off. You azz o's all fuck your selves. and that is the way i like it. why waste good resources, when you feaks fuck your selves. You see this pig i caught. She is walking into a den of snakes. She ordered it, and it'll be served by her allies, thesame ones she thought would help her, WILL do to her what those guys did to you. FUCK off. Go suck on a pacifier. You must have adildo to stick up your ass, don't you? Cuz you need to git ready, you're gonna be fucked big time. right up your tight little fag ass. Like myXXXXXX used tosay to guys You're OUT, and that meant something, i now say it. YOU'RE OUT!

# Tippy I git your azz , don't I (You are FUCKED jag off)

Date: 2010-09-08, 3:32PM EDT

Reply To This Post

http://us.mc1202.mail.yahoo.com/mc/showMessage?sMid=0&fid=Sent&filterBv=&.rand=... 9/11/2010

lakenney@msn.com - Windows Live

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foot-feet,paws. YOU DOGS YOU! HAND PICKED little fags. We gotcha now..CREEPAZOIDS.

Thanks for flagging.

<u>Please report suspected exploitation of minors to the appropriate</u> authorities

4

1st Amenment is not for ASSHOLES (Imminent danger exempt)

http://providence.craiqslist.org/rnr/1946566721.html

IF THIS CRAIGSLIST STALKER MADE SENSE, WE COULD SYMPATHIZE, BUT HE IS AN ASSHOLE. So how can we support your pleas for support, first amendment spinster. You are merely a jokester. Why do you enjoy just being a prankster. Did you turn in your pellet gun? Did you turn in your rope, we don't want you hanging it up, the can isn't bad for weaklings anymore. Even diddlers are safe in there, so try to rehabilitate before the state has to do it for us. You are exactly the prototype for an incorrigible, you are a carreer sneak pest. A pest to every girl that can't stand you, a pest to every person you disagree with. The only ally you have is MOM. AWW how sweet, you are just a scofflaw, that needs rehabilitation. Maybe an ankle bracelet. Or some intensive counseling-at your expense, You are already 100% menatlly incompetent. So we have to foot more expense, you might need the LADD school. In patient, the closed cellar part. Hey, TIPPY?

Date: 2010-09-10, 12:07PM EDT

Reply To This Post

http://providence.craiqslist.org/mr/1946926351.html



WE are ALL so glad the autorities put a lid on your daily antics. because sleezoid deserve to be controlled, you tippy bother girls and other helpless individuals, these cops don't cherish the thought of chasing down innocent posters-having good clean fun. People like you and Howdy Doody are sneaky little miscreants. Looking to lie to police and involve innocent people. People that work for a living. YOU GUYS DON'T. One has had fun fucking a married woman, while playing the guy like he was his friend. Not NICE.Watch out for misusing the state funds Howdy Doody.U'll be visited soon, and broker that your usual bust out self, and Tippy bothered politicians that truly worked hard for their constituencies. So both of you will be dealt with by the same authorities you both have manipulated over these years-while people tried to work to survive-YOU TWO were duping good citizens. Both assholes. Both going to feel the pinch of the law. The same law you scared neonle with over time you assholes believed

Cont >

http://co117w.co1117.mail.live.com/mail/InboxLight.aspx?FolderID=00000000-0000-0000... 12/15/2010

al - lakenney@msn.com - Windows Live

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I wouldn't doubt it if Howdy Doody is allowing TIPPY shit heal to FUCK Porky Pig. because this poster shit is fucking SCUM in a bottle. TIPPY is as scurmmy as HOWDY DOODY and this PORKY PIG. PORKY PIG. TIPPY and this HOWDY DOODY are as whacked out in the head as you'd ever believe weasals to be. We are banding these two jerk offs, because all will wind up in a mental institution, anyone believing they CAN BEAT CITY HALL, has to be on LSD, or just crazy. TIPPT DO and HOWDY DO, both sticking their skinny noodles in fatso PORKY PIGS CUNT. That has to be it. PORKY PIG ugh!

Please report suspected exploitation of minors to the appropriate authorities

TIPPY is such a faggot, we do not need (to say your name-just queer!)

Date: 2010-09-10, 10:17AM EDT

Reply. To This Post



http://providence.craigslist.org/rnr/1946336440.html

Any derogatory name is you know who! We all know what a total faggot you are, and you do not need to write the name. He adopts all the adjectives that fit him, and retaliates. Now is that a whack job, or what? a total freak of nature. And even the FAt PIG girl knows who she is, imagine how good you students are, I could have all of you tap dancing on the head of my dick. All guilty pieces of shit. All KNOW it is for the absolute crimes committed against the one, the altar boy, I'm an altar boy compared to the exploits of sneaky rotten pieces of garbage. SCUM, ans everyone knows who scum is. It is that simple. How great this life is! Perfect, when stankin whores are caught, and rat finks caged, it is justice. Go suck an OBAMA, Doll dick TIPPY McGoo, howdy doody is almost as stupid as TIPPY McGoo. A bunch of less than human people. Not nice people. SCUM is a compliment to the likes of you ingrates. Sniff u from new hamshire.

YES, I was dumped by a FAT SLOB girl (It was tons of fun, while it lasted!)

http://providence.craigslist.org/rnr/1946500974.html

Date: 2010-09-10, 11:39AM EDT

Reply To This Post

I DO FIT the profile of half the state of RI. certainly i do. because there are so many fat bitches . the guys that tolerate fattness are deserving of the fat whores. Because MEN , YES MEN, do not allow

http://col17w.col117.mail.live.com/mail/InboxLight.aspx?FolderID=00000000-0000-0000... 12/15/2010

lakenney@msn.com - Windows Live

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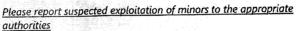
Date. ∠010-03-00, 1.30FW ED1

Reply To This Post

http://providence.craigslist.org/rnr/1939314583.html



TIPPY U LOVE TO MAKE PHONE CALLS. CAUSING BULLSHIT. GOOD THING THOSE GUYS DOWN IL SUD ARE GONNA ROCK. YOUR KIDDIE WORLD. Take Mr. Howdy Doody with you. He doesn't git the picture. Howdy believes his way is the way .Hide behind the skirt of a bulldyke. That doesn't cure the rotten ham. a ham in your ass o. a big ham. I have a center pencil for howd they do dat. Howd day doo that. POOF POOF. You will for a moment believe you are in a movie. you will not believe how popular you are. it'll be like a hollywood movie set. Only no SAg wages No kotex for the hole in your ass and HXXX.



tippy McGeel chop chop lovers fuck me (FUUUCK me! pigs)

http://providence.craigslist.org/rnr/1939475116.html



Date: 2010-09-06, 2:47PM EDT

Reply To This Post

This is when my trase was removed

PAUPERS I'M BUYING THAT SHIT HOLE. WATCH THIS WEEK A REALTOR WILL BE NOTICING U WELFARE RECIPIENTS ABOUT LEAVING. U STOOL BUMS. I BOUGHT IT THROUGH MY CORP. U R O-U-T. TOLD YOU. IT AIN'T ILLEGAL TO THROW WELFARE BUMS OUT.U GOT NO LEASE WELFARE STUDENTS

- Location: FUUUCK me! pigs

do you believe you're smart TIPPY (DO? git a floridian hole.S.P.)

http://providence.craigslist.org/rnr/1939802525.html

Date: 2010-09-06, 5:48PM EDT

Reply To This Post

TIPPY Go git a job at a Floridian radio station. The Northern drawl will be a good selling card for you. The state of flizz has a witless

Hotmail - lakenney@msn.com - Windows Live

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Date: 2010-09-09, 10:14AM EDT

Reply To This Post

44

http://providence.craigslist.org/mr/1944506634.html
The criminal's mother "protected" the guy from receiving medical help for over 5 decades, sometimes a mother's love actually hinders a child from normal growth. This craigslist pain in our assess is extremely over the line. He harrasses all the people in Narragansett. He has harrassed myriad people from all over the state. He uses fire arms-a pellet gun is considered a firearm under the general laws of this state, and worsely this person never stops to evaluate himself. HIS mom assists him. MA BARKER. Not a good thing. Please Narragansett, take a good hard look at a potential harmful nut case hurting someone. He is ill- NOT a criminal.

please flag with care:

miscategorized prohibited spam/overpost best of craigslist

<u>Please report suspected exploitation of minors to the appropriate authorities</u>

Tippy& B B Gun & Mommy lookout, (& Libelous non-stop assaults,WHY???)

http://providence.craigslist.org/mr/1944939052.html

Date: 2010-09-09, 1:47PM EDT

Reply To This Post





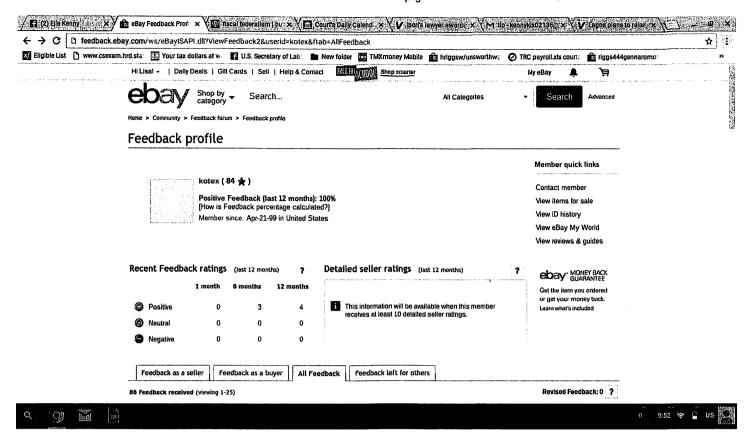
This TIPPY Falone or whatever her name is, is causing such needless havoc to the town of Narragansett. Why can not the officials execute a civil restraining order upon the scofflaw. One criminal charge is not enough to stop his menacing behavior. when a town ignores a criminal like this, only further damages occur. Most people have seen TIPPY Falone with his high powered B B gun in hand, a B B gun is a fire arm under RIGL's. Someone get this guy restrained from writing inflammatory remarks. Obtain one more search warrant for his IP number. This pattern of assault is causing much frustration. TIPPY is ill. and we should help him. If MARKOFF was stopped before he killed a woman maybe we all would be better off. PREVENTION is an area we must look at. A 30 day observationn for TIPPY might allow TIPPY to look at himself in the mirror and realize what he is doing to nice people. this guy treats everyone as if they are bad persons. TIPPY is so gravely ill. He shouldn't have firearms while out on BAIL.

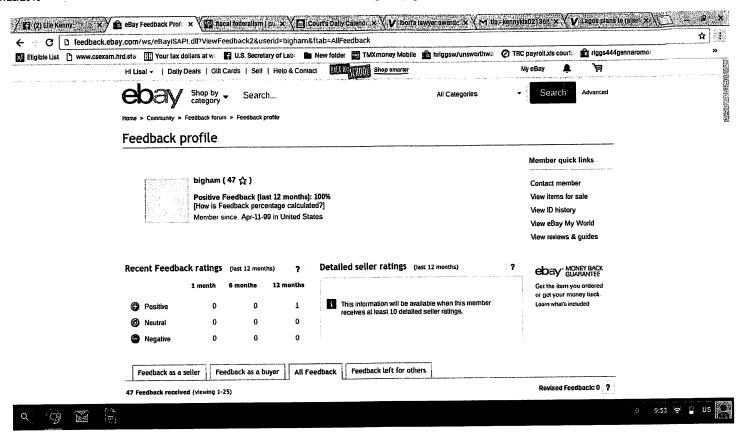
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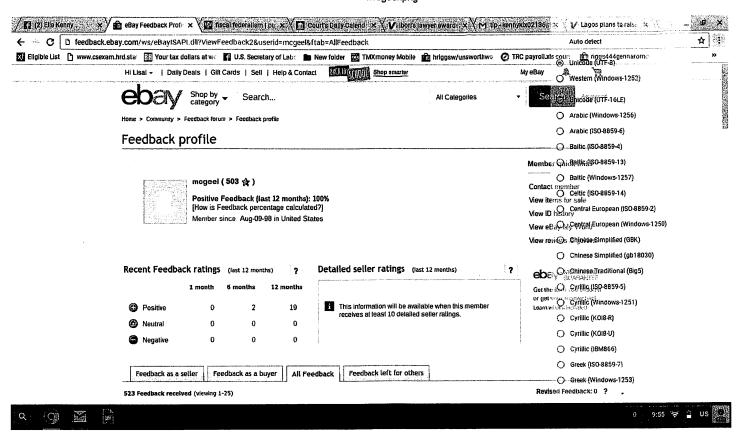
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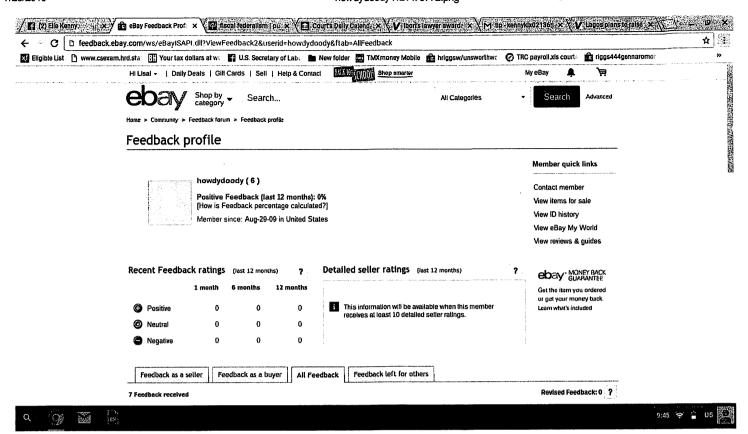
### **EXHIBIT C**

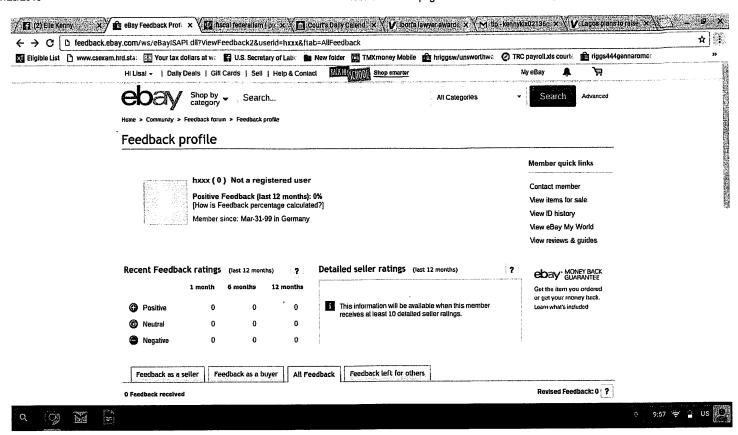
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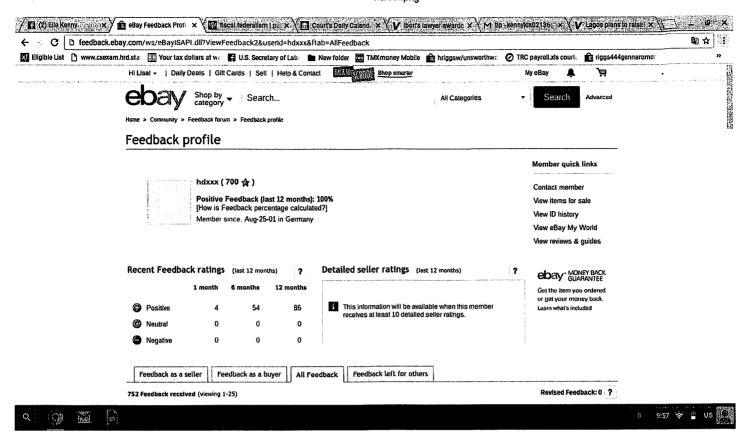


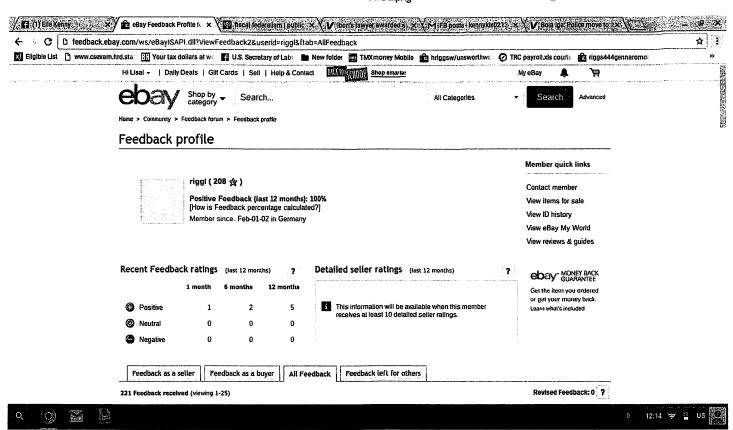


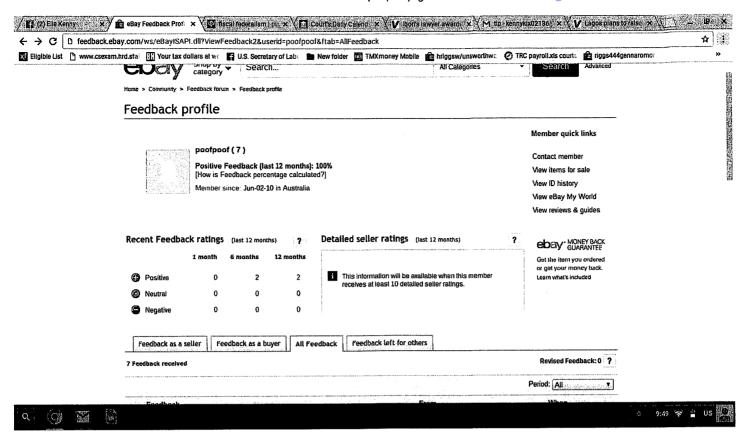












#### CERTIFICATE OF SERVICE

I hereby certify that this motion was served on the following persons on the date and in the manner specified below:

Person(s) served electronically (via ECF):

Person(s) served by mail. Please include address Charles Kenney fo fox 1003 we Charles Kenney -444 Forest 57 Me Robert Longs 38 Newbury St. of McKeon + David Marximu - Mr 37472 for Person(s) served by hand:	twood Ma 020 gr
Date of Service: <u>\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</u>	Signature  Name  Signature
	Address  Manchesty NH U3/OZ  Phone  Kenneykix oz 36 @ grand Cong  Email  603